

REMARKS

This response is submitted in reply to the outstanding Office Action dated July 15, 2009. Applicants note with appreciation the examination of the application as evidenced by the Office Action. All claims pending at the time of examination (i.e., claims 1-4, 6-13, 15-18, 20-28, 30, 31, 35, and 39-42) currently stand rejected.

The Office Action indicates that claims 1-4, 6, 7, 10-13, 15-18, 20-22, 25-28, 30, 31, 35, and 39-42 currently stand rejected under 35 U.S.C. § 103(a), as being unpatentable over Satran et al. (U.S. Patent No. 6,430,183, hereinafter "Satran") in view of Stapleton et al. (U.S. Patent No. 6,175,875, hereinafter "Stapleton"), in view of Lee et al. (U.S. Patent No. 6,490,285 hereinafter "Lee"), in further view of Steger et al. (U.S. Patent No. 6,505,247 hereinafter "Steger"). Claims 8, 9, 23, and 24 currently stand rejected under 35 U.S.C. §103(a) as being unpatentable over Satran, Stapleton, Lee, and Steger, and in further in view of Haggerty et al. (U.S. Patent No. 6,331,983, hereinafter "Haggerty"). The Office Action also objects to claim 3 for informalities.

As explained below, however, Applicants respectfully submit that the claimed invention is patentably distinct from cited references, taken in any proper combination. In view of the amendments to the claims and the remarks presented herein, Applicants respectfully request reconsideration and allowance of all of the pending claims of the present application.

A. The Objection to Claim 3 is Overcome.

Claim 3 has been objected to for missing subject matter. In response, Applicants have amended claim 3 to introduce the terms "data amount" to overcome the objection.

B. Claims 1-4, 6-13, 15-18, 20-28, 30, 31, 35, 39-42 are Nonobvious.

As stated above, the Office Action rejects all the claims as being obvious in view of a combination of Satran, Stapleton, Lee, and Steger, or in view of a combination of Satran, Stapleton, Lee, Steger, and Haggarty. According to one aspect of the claimed invention, independent claim 1, and similarly independent claims 15, 39, and 40, recites, *inter alia*, "filtering, in the routing unit, the multicast data packets in accordance with the specific

parameters for respective receivers of the multicast group to obtain filtered multicast data packets individualized for the respective receivers; and transmitting, by the routing unit, the individualized filtered multicast data packets to the addresses of the respective receivers." Independent claim 6, and similarly independent claims 21, 41, and 42, recites, *inter alia*, "filtering, in the routing unit, the addresses of the receiver list in accordance with the specific parameters to obtain filtered receiver addresses, the filtered receiver addresses being a subset of the receiver addresses included in the multicast group; and transmitting, by the routing unit, the multicast data packets to respective addresses included in the filtered receiver addresses." The language of the independent claims clarifies that the results of the filtering operations (e.g., data packets individualized for the respective receivers) are individually addressed and transmitted to appropriate receivers.

To assist in understanding an example embodiment of the invention, Applicants draw attention to Page 10, Lines 14-19 of the International Publication WO 01/19029, where the present application states "[f]or example, when the routing means 2 receives multicast data packets from the sender 1 it supplies modified multicast data packets to receiver 4a, no multicast data packets to the receiver 4b, i.e., the address of the receiver 4b is filtered out, and unchanged multicast data packets to the receiver 4c." As such, the routing means can take differing actions with respect to individual receivers based on receiver-specific parameters. A multicast data packet is therefore modified, or in some cases eliminated, based on receiver-specific parameters, and the resultant receiver-specific data packets are then separately forwarded to the respective receivers using receiver-specific addressing, rather than multicast addressing.

The Office Action relies upon the disclosure of Steger as support for the obviousness rejections of the pending independent claims for alleged disclosing "transmitting, by the routing unit, the individualized filtered multicast data packets to the addresses of the respective receivers." However, neither Steger, nor a combination of Steger with any of cited references, teaches or suggests the transmission of individually addressed packets as claimed.

The Office Action relies upon the disclosure of Steger for allegedly disclosing "transmitting, by the routing unit, the individualized filtered multicast data packets to the addresses of the respective receivers" as recited in the independent claims. However, Steger fails

to teach or suggest this feature, and since Steger is relied upon for this purpose to construct the cited combinations, the cited combinations fail to render the claims obvious.

The following excerpt taken from Steger, although repeated in the summary section, amounts to the entire disclosure of multi-cast routing provided by Steger.

In one embodiment, the server process 210 determines if a plurality of clients 230 are interested in at least a subset of the same data elements. If so, the server process 210 operates to *generate a multi-cast packet* which is a packet comprising data element values, preferably in a compressed format, which are desired by each of the plurality of clients. Once this packet is completed, i.e., when it has reached a certain size or when a certain timeout period has elapsed, *the server process 210 operates to multi-cast this packet to each of the plurality of clients 232 which are interested in this common data. A multi-cast packet is not required to be separately transmitted for each destination client 230. Rather, a multi-cast packet is transmitted only once, and routers operate to route the multi-cast packet to each of the plurality of destinations. This further reduces network traffic by reducing the amount of individual packets which would normally be required to be transmitted in a point-to-point single-cast system.*

(Steger, column 8, lines 30-47 (emphasis added))

Based on this excerpt, it is clear that Steger is referencing true multicast communications, and not a transmitting of multicast data packets to respective addresses of individual receivers as recited in the claims. In particular, the excerpt first indicates that a single multi-cast packet is generated, rather than a number of individualized packets. The excerpt also states that the server process “operates to multi-cast” the packet, thereby indicating that a multi-casting scheme for group addressing is being utilized rather than individualized addressing. Further, the excerpt indicates that the multi-cast packet is transmitted “only once.”

Regardless of whether Steger is describing a true multicast communications system, the last sentence of the excerpt reveals that the system described in Steger contradicts the subject matter of the claims. In this regard, the last sentence indicates that reductions in the network traffic occur “by reducing the amount of individual packets which would normally be required to be transmitted in a point-to-point single-cast system.” In other words, Steger is describing a mechanism that reduces the number of transmitted packets, as compared to point-to-point single-cast system. This in contrast with the claimed invention because the filtering operation of the claimed invention maintains or increases the number of data packets. Via the filtering operation,

filtered multicast data packets individualized for the respective receivers are obtained from a multicast data packet, and the individualized filtered multicast data packets are transmitted to the addresses of the respective receivers. As such, a reduction in the number of data packets is not realized as described in Steger, and Steger effectively teaches away from the content of the claims.

The claimed elements are therefore not taught or suggested by Steger and Steger teaches away from the subject matter of the claims. The remaining cited references fail to cure the deficiencies of Steger in this regard. Therefore, the claimed features would not be a predictable result of the cited combinations due to the failures of Steger.

As such, Applicants assert that the rejections of independent claims 1, 6, 15, 21, 39, 40, 41, and 42 for being obvious are overcome and the claims are in condition for allowance, based at least on the remarks provided above. Since dependant claims 2-4, 7-13, 16-18, 20, 22-28, 30, and 31 include all the recitations of their respective independent claims, as well as additional features, Applicants respectfully assert that the rejections of the dependent claims are also overcome and the dependent claims are also in condition for allowance.

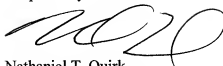
CONCLUSION

In view of the amendments and the remarks submitted above, it is respectfully submitted that the present claims are in condition for immediate allowance. It is therefore respectfully requested that a Notice of Allowance be issued. The Examiner is encouraged to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present invention.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

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